

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

ELLYSE WISSEL; MICHELLE  
ANDERSON; and MCLAIN MOTT,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

V.

RURAL MEDIA GROUP, INC.,

Defendant.

[illegible]

Case No. 4:24-CV-999-P

**UNOPPOSED THIRD MOTION TO EXTEND DEADLINE TO RESPOND TO  
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 7.1 of the U.S. District Court for the Northern District of Texas, Defendant Rural Media Group, Inc. (“RMG”) moves for a 30-day extension of RMG’s deadline to respond to the Complaint. In support of this Motion, RMG respectfully states as follows:

1. RMG's current deadline to respond to the Complaint is December 20, 2024. (ECF No. 12.)
2. A class-wide settlement in principle has been reached in *Saarloos v. The Cowboy Channel, LLC*, No. 5:24-cv-2058, the earlier-filed putative class action pending in the U.S. District Court for the Central District of California. A notice of settlement is being filed in that case today, and RMG anticipates that the plaintiff in *Saarloos* will file a motion for preliminary approval of the settlement within the next 45 days.

3. Plaintiffs' counsel are evaluating whether and how this case should proceed in light of the class-wide settlement in principal that has been reached in *Saarloos*, which impacts whether any response to the Complaint and any scheduling order in this case will be necessary.

4. RMG respectfully submits that these unique circumstances constitute good cause to extend the deadline for RMG to respond to the Complaint by 30 days (up to and including January 21, 2025 due to the intervening federal holiday). The requested extension is not for the purposes of delay or other improper purpose. Accordingly, the requested extension will not prejudice the orderly administration of this matter and will promote judicial efficiency.

5. RMG has conferred with Plaintiffs regarding this Motion and Plaintiffs do not oppose the requested extension.

WHEREFORE, Defendant Rural Media Group, Inc. respectfully requests that the Court extend its deadline to respond to the Complaint by 30 days, up to and including January 21, 2025 due to the intervening federal holiday.

**CERTIFICATE OF CONFERENCE**

I hereby certify that the Parties conferred on December 17, 2024 regarding the extension sought herein, to which Plaintiffs' counsel agreed.

Dated: December 18, 2024

Respectfully submitted,

**BAKER & HOSTETLER LLP**

/s/ Ambika B. Singhal

Ambika B. Singhal  
Texas Bar No. 24132954  
2850 North Harwood Street, Suite 1100  
Dallas, Texas 75201  
Tel: 214.210.1200  
Fax: 214.210.1201  
asinghal@bakerlaw.com

Rachel Palmer Hooper  
Texas Bar No. 24039102  
811 Main Street, Suite 1100  
Houston, Texas 77002  
Tel: 713.646.1329  
Fax: 713.751.1717  
rhooper@bakerlaw.com

*Counsel for Defendant  
Rural Media Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of December 2024, a true and correct copy of the foregoing was filed with the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Ambika B. Singhal